

IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF MISSISSIPPI

IN RE: PARHAM POINTE SOUTH, LLC  
F/K/A CHATHAM COURT APARTMENTS

CASE NO 08-02318-NPO  
CHAPTER 11

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RESPONSE TO UNITED STATES TRUSTEE'S MOTION TO CONVERT  
OR, ALTERNATIVELY TO DISMISS

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COMES NOW the Debtor (Parham South), by and through its attorney of record, and files this its Response to United States Trustee's Motion to Convert or, Alternatively to Dismiss, in the above-styled and numbered cause and as grounds therefore, would show the following:

1. The Debtor has no assets from which to pay any creditors, attorney's fees, or any other expenses.
2. The Debtor would incur additional expenses and would not have the means to pay if the case were to be converted to Chapter 7.
3. The Debtor would confess the Motion to Convert or, Alternatively to Dismiss and moves this Court to dismiss its Chapter 11 case.

RESPECTFULLY SUBMITTED, this the 26<sup>th</sup> day of November, 2008.

/s/T.K. Moffett  
T.K. MOFFETT (MSBN 3402)  
Attorney for Debtor, Parham Pointe South, LLC

**MOFFETT LAW FIRM, PLLC**  
401 North Main St.  
Amory, MS 38821  
Telephone: 662-257-0809  
Telecopier: 662-257-9988

CERTIFICATE OF SERVICE

I, T.K. Moffett, attorney for Debtor, do hereby certify that I have this day electronically filed the above and foregoing with the Clerk of the Court, utilizing the ECF system which sent notification of the filing to the following:

Attorney for Fannie Mae  
Jeffrey Ryan Barber [jbarber@watkinsludlam.com](mailto:jbarber@watkinsludlam.com) [jdurr@watkinsludlam.com](mailto:jdurr@watkinsludlam.com)

R. Michael Bolen [USTPRegion05.JA.ECF@usdoj.gov](mailto:USTPRegion05.JA.ECF@usdoj.gov)

And to the following via US Mail, postage prepaid.

See Attachment.

This the 26<sup>th</sup> day of November, 2008.

/s/ T.K. Moffett  
T.K. Moffett

**MOFFETT LAW FIRM, PLLC**  
401 North Main St.  
Amory, MS 38821  
Telephone: 662-257-0809  
Telecopier: 662-257-9988  
Contact: [robinbenenson@moffettlaw.com](mailto:robinbenenson@moffettlaw.com)

Parham Pointe South, LLC  
Exhibit A Mailing List

Case No. 08-02318  
Chapter 11

Ballard Realty Company, Inc.  
5950 Carmichael Place, Suite 200  
Montgomery, AL 36117

Illustratus  
10983 Granada Lane  
Overland Park, KS 66211

ADT  
P.O. Box 371967  
Pittsburg, PA 15250

James Gray  
P O Box 3131  
Ridgeland MS 39158-3131

AT & T.  
PO. Box 105262  
Atlanta, GA 30348-5262

Louis D. Carpenter d/b/a  
L&M Carpet Cleaning  
308 Shiloh Rd. Apt 15  
Brandon, MS 39042

Apartment Guide Book  
PO Box 98207  
Jackson, MS 39298

Labor Finder of Jackson  
P.O. Box 9171  
Jackson, MS 39286

Buyers Access  
1777 South Harrison Street Suite 300  
Denver, CO 80210

Mc's Air Conditioning  
P.O. Box 721048  
Byram, MS 39272-1048

Dixie Glass & Mirror  
6362 Cole Road  
Ridgeland, MS 39157

Pro Lawn Care  
1923 Spillway Road Suite 134  
Brandon, MS 39042

Graham Taylor Pest Control  
P.O. Box 968  
Pelahatchia, MS 39145

Ricoh Americas Corp  
P.O. Box 105533  
Atlanta, GA 30348-5533

Greenpark Financial Limited Partnership  
7501 Wisconsin Avenue, Suite 1200  
Bethesda, MD 20814

Southern Floor Covering  
5010 Hwy 80 East  
Pearl, MS 39208

HD Supply  
P.O. Box 509058  
San Diego, CA 92150-9058

US Attorney Hon David N. Usry  
188 E Capitol Street Suite 500  
Jackson, MS 39201-2126

IRS  
100 W Capitol Street Suite 504  
Jackson, MS 39269-0599

US Securities & Exchange Comm  
Suite 1000 3475 Lenox Rd NE  
Atlanta, GA 30326-1232

Bureau/PL, LLC  
c/o R. Scott Wells  
Po Box 1925  
Biloxi, MS 39533-1925

Watkins & Eager PLLC  
P.O. Box 3858 Jackson, MS 39207

Kevin Gainey d/b/a Gainey's Carpet One  
456 Franklin Rd.  
Morton, Ms 39117

Donald O. Flanders  
Dixie Glass & Mirror, LLC  
6362 Cole Road  
Ridgeland, MS 39157-6001

Advance Steam Extraction, Inc.  
3165 Virginia St.  
Pearl, MS 39208